BLANK ROME LLP Attorneys for Intervenors Jeremy J.O. Harwood (JH 9012) 405 Lexington Avenue New York, NY 10174 (212) 885-5000

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

COSMOTRADE EXPORTS S.A.,

07 CV 9377 (RWS)

Plaintiff,

- against -

RULEWAVE LLC (DUBAI) a/k/a RULEWAVE LLC,

Defendant.

NOTICE OF MOTION UNDER RULE E OF THE SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND MARITIME CLAIMS AND LOCAL ADMIRALTY RULE E.1 FOR VACATUR OF PLAINTIFF'S MARITIME ATTACHMENT OF THIRD PARTY PROPERTY

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the Affidavit of Jeremy J.O. Harwood dated March 14, 2008 and Declarations of Henk Post, Hartmut Stuhldreier and Barry Whiteley, all dated March 14, 2008 and all the exhibits thereto, Intervenors will move this Court before the Hon. Robert W. Sweet, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an Order pursuant to Rule E(4)(f) of the

Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure vacating the security that Plaintiff has attached belong to the Intervenors and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, under Local Rule 6.1(c) of the United States District Courts for the Southern and Eastern Districts of New York and the Court's individual practice rules, oral argument will be heard if so directed by the Court or upon application and that oral argument is so requested.

Date: New York, New York March 14, 2008

Respectfully submitted,

BLANK ROME LLP

By: January J.O. Harwood

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Attorneys for Intervenors